

# MORRISON TENENBAUM

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**MEMO ENDORSED**

February 24, 2022

VIA ECF

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

Re: SingularDTV GmbH v. Doe; Civil Action No.: 1:21-cv-6000-VEC

Dear Judge Caproni,

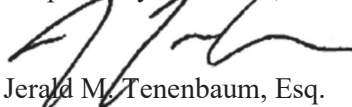
Morrison Tenenbaum PLLC is counsel to Plaintiff, SingularDTV GmbH, in the above referenced matter. As detailed in our complaint, in May of 2021 SingularDTV GmbH (the “Company”) fell victim to a hacking incident and theft of cryptocurrency. The objectives of that litigation are to identify the perpetrator(s) of the hack and to recover the stolen cryptocurrency.

The shareholders of SingularDTV GmbH, Zach LeBeau, Joseph M. Lubin and Arie Levy-Cohen, have recently become entangled in heated internal disputes that have culminated in multiple lawsuits, including *SingularDTV GmbH v. LeBeau, et al.*, No. 1:21-cv-10130 also before this Court (the “Adversary Proceeding”). It has come to our attention that the Court has scheduled a pre-trial conference in the Adversary Proceeding for Friday, February 25, 2022 (tomorrow) at 2:00 p.m. at which the opposing factions will have the opportunity to argue whether the Adversary Proceeding should be consolidated with the *John Doe* matter commenced by our firm on behalf of the Company.

As counsel for SingularDTV, we respectfully request that Morrison Tenenbaum PLLC be permitted to appear at tomorrow’s Pre-Trial Conference on behalf of SingularDTV GmbH. Or if our appearance is not permitted, that the conference be adjourned, and Morrison Tenenbaum PLLC be given the opportunity to prepare an *amicus curiae* brief on behalf of SingularDTV GmbH in opposition to consolidation of the *John Doe* matter with the pending Adversary Proceeding.

We apologize for our late notice, as we just became aware of the Court’s Memo Endorsement.

Respectfully submitted,

  
Jerald M. Tenenbaum, Esq.  
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*Attorneys for Plaintiff*

Application GRANTED. Counsel for SingularDTV GmbH in this case may appear at the conference in 21-CV-10130 on February 25, 2022, at 2:00 p.m.

SO ORDERED.

  
2/24/22

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE